

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,
JOSE MAGAÑA-SALGADO,
NANCI J. PALACIOS GODINEZ,
ELLY MARISOL ESTRADA, KARINA
RUIZ DE DIAZ, CARLOS AGUILAR
GONZALEZ, KARLA LOPEZ, LUIS A.
RAFAEL, DARWIN VELASQUEZ,
JIN PARK, OSCAR ALVAREZ,
NANCY ADOSSI, DENISE ROMERO,
PRATISHTHA KHANNA, JUNG WOO
KIM, ANGEL SILVA, MOSES KAMAU
CHEGE, HYU-WON JEON, ELIZABETH
DIAZ, MARIA DIAZ, and BLANCA
GONZALEZ.

Defendant-Intervenors.

NOTICE OF INTENTION TO TAKE ORAL DEPOSITION OF KENNETH PALINKAS

TO: Plaintiff State of Texas, et al., through their attorney of record: Todd Disher,
Special Counsel for Civil Litigation, P.O. Box 12548, Austin, Texas 78711-2548,
todd.disher@oag.texas.gov.

YOU ARE HEREBY NOTIFIED THAT, PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30, the deposition of KENNETH PALINKAS will be taken at 26 Federal Plaza, New York, NY 10278 commencing on Tuesday, June 19, 2018, at 1:00 p.m. The deposition

will be taken by stenographic means and also may be videotaped. The deposition will continue from day to day until completed.

Dated: June 12, 2018

Respectfully submitted,

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046);
(SD of Tex. Bar No. 21127)

Attorney-in-Charge

Celina Moreno (Tex. Bar No. 24074754)
(SD of Tex. Bar No. 2867694)

Jack Salmon (Tex. Bar No. 24068914)
(SD of Texas Bar No. 1130532)

Alejandra Ávila (Tex. Bar No. 24089252)
(SD of Tex. Bar No. 2677912)

110 Broadway, Suite 300

San Antonio, Texas 78205

Phone: (210) 224-5476

Facsimile: (210) 224-5382

Email: nperales@maldef.org

Denise Hulett

Mexican American Legal Defense and
Educational Fund

1512 14th Street

Sacramento, CA 95814

Phone: (916) 444-3031

Email: dhulett@maldef.org

(Admitted pro hac vice)

**GARCÍA & GARCÍA,
ATTORNEYS AT LAW P.L.L.C.**

Carlos Moctezuma García

(Tex. Bar No. 24065265)

(SD of Tex. Bar No. 1081768)

P.O. Box 4545

McAllen, TX 78502

Phone: (956) 630-3889

Facsimile: (956) 630-3899

Email: cgarcia@garciagarcialaw.com

Attorneys for Proposed Defendant-
Intervenors

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has emailed a true and correct copy of the above and foregoing on the 12th day of June, 2018

/s/ Nina Perales
Nina Perales